

TO: North Carolina Department of Transportation
Federal Highway Commission

FROM: Ronald J. Oberle
Citizen of Blowing Rock, NC

SUBJ: Public Hearing, Project R-2237C
August 26, 2002

I am here tonight as a full-time resident of Blowing Rock, (a total of 50 years with the last 10 years as full-time.)

I am a retired engineer and attorney and have worked on very large transportation projects including the Washington DC subway construction and the high-speed railroad system from Washington to Boston.

There are lots of things not to like about the preferred alternative, widening through Blowing Rock, which I noted at the first meeting in Patterson about February 1990.

I don't like the concept of putting a multi-lane highway through a small town, or using historically significant properties for a highway because NCDOT is unwilling or unable to design and build a by-pass in difficult terrain, or disrupting traffic on the Boone-Lenoir traffic path for about five years while destroying one of North Carolina's oldest resort areas.

But I am not going to talk about such matters--others will do so and will continue to do so until a by-pass is built or a court decides the matter for us.

We can agree on one thing. We all want a fourlane highway . I want it because by the time it is finished my 3 grandchildren who live in Hickory will be off to college--perhaps ASU like their parents and I want an efficient, safe and expeditious way for them to travel from Hickory to Boone. Fortunately the NC Legislature anticipated this need in 1989 by passing the Highway Trust Fund Act which set up an intrastate highway system consisting of a network of NC and US highways connecting major population centers, including Hickory and Boone, to provide efficient, safe and expeditious travel.

I am opposing the "widening" alternative prepared by DOT because, in my opinion, it is neither as efficient, safe, or expeditious as it needs to be to satisfy the mandate of the Highway Trust Fund Act.

This DEIS is a classic case of cognitive dissonance--the concept of holding two contradictory ideas simultaneously. One widening the highway through Blowing Rock because it is cheaper and easier even though it adversely impacts the town and the existing road-

conditions--more than 81 curb cuts, many traffic lights , slow local traffic of elderly and tourists. The other building an efficient, safe, and expeditious corridor between Lenoir and Boone.

NCDOT apparently has decided "cheap and easy" is good enough for this area! We shall see.

If NCDOT recommends "widening in the EIS", I guess a court will decide for us.

The Widening Alternative is Not Efficient

Distance The distance from Blackberry to Aho is 46% longer along the widening rather than the Alternate 4A/B (5.85 v. 4.0 miles.)

Urban Traffic Impediments Various factors disrupt efficient traffic flow along the widened highway. The impact of these impediments occurs in both cars (inconvenience) and trucks (major impact on operating costs.) Some of the impediments along the widened route are:

Entering/ Leaving Traffic. At intersections and the more than 81 curb cuts along the route traffic flow is interrupted or stopped.

Traffic Signals. Interruption to flow caused by signals and turning traffic. Signals along proposed route at: Green Hill Road
US 321 (business)
Sunset Drive
US 221
Possum Hollow

Other signals may also be required further impeding efficient flow.

Left Turning Traffic. Major interruptions at unsignalized intersections without left turn lanes including

Ransom Street (Days Inn)
Norwood Circle
Country Club Drive
Pinnacle Avenue (Canyon's Restaurant)

"U" Turning Traffic. Significant interruptions possible at median cuts as vehicles make "U" turn to backtrack to businesses on other side of median. These include Skyland Drive. Southbound traffic for 3 businesses on east side of 321
Ransom Street. Northbound traffic for 2 locations on west side. Southbound traffic for 2 locations on east side.
Church Street. Northbound traffic for 6 locations (4 restaurants). Southbound traffic for 5

on east side.
 Sunset Drive. Northbound traffic for 10 locations including ABC store. Southbound traffic for 1 store on east side.
 Blowing Rock Stage Company. Northbound traffic for 5 shops in old Goodwin Weavers complex, several offices on West Cornish Road.

Speed Discontinuities. Speed doesn't kill or even cause accidents but speed discontinuities do. Mix slow moving traffic, especially elderly drivers and tourists, with speeding heavy trucks and students and there is the recipe for disaster. When you consider that Blowing Rock has an elderly population twice the NC average and getting higher each day and that a great percentage of our visitors are of retirement age during the peak travel period--leaf season. It is a miracle that the fatal/serious injury rates are so low. One factor is the speed control inherent in a 2 lane highway with no passing markings. For example, when I enter 321 at Pinnacle Avenue to go to Food Lion and travel at the posted speed of 35 mph traffic usually backs up 5-10 cars deep behind me in that short 1 1/2 mile distance. The widened highway removes that control and a higher accident rate would ensue.

Steep Grades. The final serious problem to efficient truck operations within the project corridor are the steep grades between Blackberry Road and Green Hill Road. The grades that result in very slow traffic still remain.

All the above factors: distance, entering/leaving heavy traffic, left and "U" turning traffic, speed discontinuities and steep grades result in an inefficient highway, at least, when compared to something like Alternative 4A/B. Stop/go traffic with constant braking and acceleration can easily double truck direct operation costs compared to the lower, steady-state costs of operating on a rural controlled access bypass.

The Widening Alternative is Not Safe.

As can be expected, NC Average Accident Rate for 4 lane urban highways is much greater for 4 lane rural highways. For example, the rate for a 4 lane urban undivided highway--the widened US321 from the southern town limit to US 321 (Business) is 322.4 or 82% higher than for 4 lane rural highway rate of 176.8 experience on a rural controlled-access bypass such as Alternative 4A/B.

Using the NC Average Accident Rates for 4 lane rural and urban highways in the DEIS and the length and type of the segments along US 321 widening project you can calculate a "blended" rate for the project. The "blended rate" so calculated is 208.22 which is greater than the existing rate of 188.03. Thus, the widening project

could make the travel more, not less, dangerous on the average. Further, the expected accident rate could be even higher based on the location and type of accidents in Blowing Rock as noted in the DEIS.

Some examples of such accidents are:

Intersection Accidents. These accidents usually involve rear-ending slow or stopped vehicles (48%) or angle collisions (24%) as reported in the DEIS. However, the actual accident rate should be higher with the higher speeds of a 4 lane road and the massive number of "U" turns being made to go to the restaurants and other stores on the opposite side.

Driveway Entering/Leaving Accidents. For the reasons above, the number of these accidents should also increase.

Speed Discontinuities Accidents. High speed long distance traffic is incompatible with local traffic which is why towns have bypass roads to divert through traffic from local traffic. This is even more important when the local population contains twice as many elderly persons than the NC average and the tourists in the peak travel months--the "leafers" are, in the majority, elderly and unfamiliar with the area.

For all the above reasons, widening US321 through Blowing Rock can be expected to be an unsafe road with a higher overall accident rate and a significant increase in serious injury and fatal accidents. Based on data supplied several years ago by NCDOT, I estimated that widening through Blowing Rock could, on the average result in one fatal accident per year in the design year in the project area. These data may be outdated but it certainly appears that the new road will be unsafe by the time it is completed and most certainly much more unsafe than a rural bypass such as Alternative 4A/B.

These predictions hopefully never come true. but if the widening is completed and if the analysis is correct all we will be able to do is mourn the dead and regret we were not able to stop NCDOT widening US321.

The Widening Alternative is Not Expeditious.

The widening project will improve traffic flow in the area on the peak traffic times but no nearly as well as a bypass. In addition it is not as expeditious for through traffic. For example, the expected travel time between Blackberry and Aho roads is calculated to be 10 minutes and 48 seconds along the widening project as compared to 5 minutes and 20 seconds along either Alternative 4 or 4B--a saving of 5 minutes 25 second-- 50%.

These times are calculated using known distance between the end points, posted speeds, and assuming no traffic

delays and only LOS C delay of 25 seconds at each traffic signal.

The overall time savings to the traveling public using the DEIS ADT figures of 14,100 to 27,450 vehicles is significant even though each driver only saves about 5½ minutes per trip.

In summary, the widening alternative should not be selected for the EIS because it will result in a route that is not efficient, not as safe, and not as expeditious as we, as taxpayers, have a right to expect.

This DEIS is a classic case of cognitive dissonance-- the concept of holding 2 contradicting ideas at the same time--NCDOT clearly wants to build a safe and efficient highway -- the engineers are very competent and want to do a good job--but seem to ignore or minimize the effects the appalling conditions along the route including:

- unrestricted access with more than 81 curb cuts.
- terrible local conditions at some signalized intersections and "U" turns at median cuts.
- Severe speed discontinuities between slow local traffic with many elderly drivers and tourists unfamiliar with the area competing with through traffic (88%) intent on getting to their final destination.

NCDOT wants to minimize expenditures even if careful analysis indicates the preferred alternative--the cheapest will not meet the statutory mandate of an efficient, safe, and expeditious highway.

NCDOT has apparently decided cheap is good enough for the people in this area. If that is so, and the EIS recommends the widening alternative, the final decision will have to be made by a Federal judge either in NC or in Richmond, VA.

We all have a dog in the fight--the safety of our travel in this area and of our children and grandchildren including those not born-and our visitors.

This is more than a struggle over property values.

It is more than a culture clash between rural areas and the residents of Blowing Rock.

more than a clash between historic preservation and peace of living in the valley.

more than a class struggle between the residents of Blackberry, Bailey's Camp, Aho and Blowing Rock

more than a clash between us and them; between year around and summer residents; between newcomers and original families. I have been here and considered a newcomer by many.

more than the difference between the cost for the widening alternative grossly understated and the bypass

alternative "gold-plated" cost estimates-- the differences in cost spread over the life of the improvement--50 plus years-- is trivial compared to lives saved on a bypass.

What is important is doing what is safest for ourselves, our children and our grandchildren and travelers we never know.

Thank you,

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9/20/02

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Project Development and Environmental Analysis Branch
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Letter 1 of 5
Page 1 of 12 incl. Attachments


Re: US 321 Improvements Project
Federal Aid No. NHF-321 (1)
State Project No. 6.7939001T/
TIP No. R-2237C
Caldwell and Watauga Counties, NC

Dear Mr. Gilmore, P.E.:

Thank you for permitting me to comment concerning the areas in the Draft Environmental Impact Statement (DEIS) and Draft Section 4(f) Evaluation dated June 3, 2002, for the subject project. In order to facilitate your review and to expedite your response to these comments, I will provide a separate letter for each section for which I wish to comment. This letter comments on Sections 1.0, 1.1, 1.2, 1.5.5, 1.5.6, and 1.5.7.

These comments are included as separate attachments.

Very truly yours,



Ronald J. Oberle

Attachments

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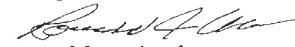
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TIP No. R-2237C
Caldwell and Watauga Counties, NC

Dear Mr. Graf:

Attached are copies of my five letters (with attachments) mailed today to Mr. Gilmore providing comments on the subject project. After careful review of the Draft Environmental Impact Statement (DEIS) and Draft Section 4(f) Evaluation and examining some of the supporting documentation, I believe that the DEIS is inadequate in its factual content and analysis and fails to provide a clear basis for choice among options by decision-makers and the public.

I believe further that Section 4(f) fails to show that there is no feasible and prudent alternative to use of the Section 4(f) property in the Green Park Historic District and that the Federal Highway Administration should require that a bypass of the Historic District be included in the Environmental Impact Statement. Detailed review of the DEIS shows a lack of integrity of intent because it fails to make a fair and objective assessment of the various alternatives to widening US 321 through the Green Park Historic District and using properly protected under Section 4(f). The alternatives to widening presented in the DEIS are not designs that failed but designs that were planned to fail. The cost of the widening alternative, in my opinion, is grossly understated and that of the other build alternatives overstated.

Very truly yours,



Ronald J. Oberle

Attachment:

Letters to Mr. Gilmore (5 w/ attachments)

B-134

Section 1.0 THE WIDENING ALTERNATIVE VIOLATES THE LETTER AND SPIRIT OF THE HIGHWAY TRUST FUND ACT OF 1989.

The motivation for this project is Section 136-178 of the NC Highway Trust Fund Act of 1989 which established the intrastate highway system to provide "high-speed, safe travel service...to support statewide growth and development objectives". The proposed "widening alternative" fails in each of these tests.

1. It is certainly NOT HIGH-SPEED with a posted speed of 35 miles per hour and 5 traffic signals to interrupt traffic flow. In fact, calculations show that the travel time from Blackberry Road to Aho Road along the widened US 321 (assuming travel at posted speed and LOS C at each ~~signal~~ ^{intersection}) is 10 minutes 48 seconds compared to the same trip on Bypass 4A/B of 5 minutes 20 seconds--a difference of more than 50%.

2. It is NOT SAFE. A so-called "blended" accident rate (using NC Statewide Average Accident rate for the type of road/road distance) for the widened US 321 is 208.22 while the accident rate along Bypass 4A/B is 176.8 and, thus, is much safer. In addition, a Bypass avoids the speed discontinuity between local and the higher speed through traffic which makes the widening alternative even more unsafe.

3. It is NOT CONVENIENT for through-traffic motorists. Forcing through-traffic motorists to transit within the Town of Blowing Rock is incomprehensible. They have been traveling about 55 miles per hour on a rural, divided, 4 lane highway and are then being forced to reduce speed to 35 miles per hour, stop at 5 traffic signals, avoid cars stopped to make left turns, avoid cars making "U" turns at the 5 median cuts and generally have to comele with local (slow, elderly drivers), tourists wandering about town lost, and cars entering and leaving 321 at more than 81 curb cuts. This so-called "speed discontinuity" is the cause of most of the reported accidents along the existing 321 including 48% rear end collisions at intersections and 24% angle accidents involving cars entering/leaving the highway.

4. It will certainly NOT SUPPORT STATEWIDE GROWTH AND DEVELOPMENT. Forcing traffic through a small town is not conducive to growth and development. Forcing truckers to navigate local traffic, stop at 5 traffic signals, travel at 35 miles per hour instead of going a constant speed on a limited access highway bypass is quite inefficient as to time and operating costs. In addition, the widening alternative could be devastating to existing local business during the 4 year construction period. Even if post-construction businesses want to return to the Valley Boulevard (US 321 Business to US 221) area they will find much of the General Business lots no longer exist or, if they exist, their parking lots have been lost to highway construction.

5. It will have adverse effect (destroy) the local economy which is based on the "unique and historic character of Blowing Rock" (DEIS p.2-36). The DEIS recognized that the "Town of Blowing Rock has been a summer resort for more than 150 years...and by the late 1800's the town had become one of the South's main summer resorts...and continues as a resort community" (DEIS p.3-2). 25% of all jobs in Watauga County are tourism related (DEIS p.3-7) and this will adversely alter tourism. The widening alternative will "give the Town of Blowing Rock a more urban feel, reducing the current small town atmosphere of this resort community" (DEIS p. xiv). Why does DOT want to kill the goose that has laid golden eggs for the Northwest mountains for over 150 years?

Section 1.1 THERE IS NO DISPUTE THAT IMPROVEMENTS ARE REQUIRED TO US 321 IN THE BLOWING ROCK AREA. HOWEVER IN THIS AND MOST OTHER SECTIONS THE DEIS PRESENTS CONCLUSIONARY STATEMENTS WITH NO REFERENCE TO FACTUAL BASIS FOR THE STATEMENT.

SERVICE DEFICIENCIES

Traffic service deficiencies clearly exist south of Green Hill Road which are caused by poor highway design (excessively steep grades) resulting in slow trucks ascending the grade. THESE GRADES WILL NOT BE IMPROVED IN THE PREFERRED WIDENING ALTERNATIVES.

The DEIS fails to discuss a less expensive option of constructing a third lane between Blackberry Road and Green Hill Road to permit passing of slow moving trucks bringing peak hour level of service on this segment to an acceptable level (LOS B or C). This third "climbing lane" would also impact in a favorable manner the level of service in the remainder of US 321 in the project area by eliminating the "bunching effect" caused by a long line of traffic following the slow trucks into Blowing Rock even during peak hour traffic.

The DEIS provides no data in support of its assertion that the current level of service is a Level E when daily use of the road suggests a Level C except for a few hours on a few days in the "Leaf Season" when Level E may be experienced.

THE WIDENING ALTERNATIVE WILL NOT PROVIDE THE REQUIRED HIGH LEVEL OF SERVICE REQUIRED BY THE SPIRIT AND INTENT OF THE HIGHWAY TRUST FUND ACT.

The road as proposed will not provide the required high level of service at least in the Blowing Rock area. Based on the NCDOT data provided at various times since 1995, at times contradictory, when properly analyzed, will be overcrowded, unsafe, and obsolete upon its completion or shortly thereafter. A four-lane bypass of Blowing Rock appears to be the only solution to the long-term transportation needs of the Lenoir-Boone corridor providing a total of 6 lanes and 2 separate routes in case one is blocked.

ACCIDENT RATES

The DEIS is misleading when it states that the TOTAL ACCIDENT RATE within Blowing Rock is 28% higher than similar urban U.S. routes in NC. It fails to note that a majority of accidents in Blowing Rock are very minor fender benders with relatively few injuries. In fact, a you are likelier to be involved in a property damage accident at Shoppes on the Parkway or at the Post Office than on US 321. DEIS also neglects to note that on the existing US 321 clusters of accidents happen

at intersections, entrances and exits at the 81 curb cuts within the town and are caused by excessive speed and driver inattention. These accidents are property damage with little or no injury because of the slow speeds involved. DOT is trying to increase the speed of traffic flow in quest of a better LOS score but with a likely in fatal and severe injury accidents.

The DEIS provides no factual basis for the statement that the road as proposed will result in an improvement of safety at least in the Blowing Rock area. The DEIS uses a faulty comparison in showing the widened road by using specific sections compared to statewide averages but uses only injury and total accidents in Blowing Rock.

THE ACCIDENT RATE FOR THE WIDENING ALTERNATIVE IS GREATER THAN FOR THE EXISTING HIGHWAY AND MUCH GREATER THAN FOR A TRUE BY-PASS.

A so-called "blended" accident rate can be calculated (using NC Statewide Average Accident rate for the type of road/road distance). The route calculated for the existing US 321 is 188.03 while the rate for the widened US 321 is 208.22 while the accident rate along Bypass 4A/B is 176.8 and, thus, is much safer. In addition, a Bypass avoids the speed discontinuity between local and the higher speed through-traffic which makes the widening alternative even more unsafe. In addition, the DEIS does not factor in the higher speeds that would result from a four-lane highway (even with the same posted speed) and the effect of the massive number of "U" turns expected at the breaks in the median to enable persons to go to businesses on the other side.

The DEIS (p.1-2) invokes the 1989 Highway Trust Fund Act (HTFA) as the driving force behind this project when, in fact, the preferred alternative--the widening of the existing highway violates the spirit and intent of the Act which is to provide "high-speed, safe travel service...to support statewide growth and development objectives". The proposed "widening alternative" fails in each of these tests. See discussion 1.0.

Section 1.2

THE PROJECT PURPOSE IS UNNECESSARILY LIMITED TO BLACKBERRY ROAD TO US 221 AND SHOULD BE RECAST TO MEET THE REQUIREMENTS OF HFTA WHICH IN THIS CASE MEANS LENOIR TO BOONE.

TRAFFIC FLOW

The short-sighted nature of the project is apparant by a simple calculation of the travel time from Blackberry Road to Aho Road. Under ideal conditions (traveled at the posted speed with LOS C at traffic signals) the trip takes 10 minutes 48 seconds along the widening alternative while only 5 minutes 20 seconds along either Bypass 4A/B.

The widening alternative will improve traffic flow just as a larger diameter pipe will move more liquid even when the smaller and larger pipe have similar impediments to flow. However, even greater flow will result in removing the impediments in the larger pipe.

The HFTA requirements can best be met by using a true bypass such as 4A/B, and, in fact, the bypass option is the only way to meet the spirit and intent of the Act.

ACCIDENTS

For the reasons noted in Section 1.1 comments, the widening alternative will result in an increased accident rate with an increase in fatal and serious injury accidents.

DEIS notes possible steps that could be taken to reduce accidents but fails to note that the widening alternative as presented fails to meet design standards and left turn lanes at high accident locations were rejected as unneeded. I guess that, following a DOT tradition, safety improvements will be made ^{only} after a fatal accident occurs. Although improved safety was one of the first features touted by DOT, many of the improved features in earlier designs have not been offered in the most recent design. For example, the first 4 lane section south of Blackberry Road--the area's most dangerous and catastrophic accident locations--was discussed and DOT promised the "S" curves would be straightened and made safer. However, neither the middle section (R-2237B) nor the present project plans show this section.

Accident analysis shows that "the most common accidents are rear end collisions...and collisions between through traffic and crossing or turning traffic". The design of the road as proposed, at least in the section through Blowing Rock, will increase the likelihood of such accidents because of the 81 cuts (driveways and streets) within a 2.1 mile segment and the necessity for drivers to make "U" turns to visit businesses on the other side of the median at the few breaks in the median shown because of higher speeds in a 4 lane section.

Section 1.2

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The left hand lane will be blocked by left and "U" turning traffic and the right lane by persons entering and leaving the road. All these problems are exacerbated by the dangerous mixture of local, tourist, and long distance drivers with different speed expectations. These problems can be avoided with a bypass road that will divert the through traffic and ^{drive the} tourists in Blowing Rock.

The DEIS notes that safety could be improved by straightening of substandard curves but in the design through the Green Park Historic District the NCDOT fails to follow its own design standards and shows design exceptions for speed, curvature, line-of-sight, and superelevation. All these design exceptions can be avoided by a properly designed bypass around Blowing Rock--the only really safe way to more traffic from Lenoir to Boone and satisfy the TIP.

Section 1.5.5 TRAFFIC DATA AND ESTIMATES ARE BOTH TRIVIAL AND MISLEADING BECAUSE OF THE PAUCITY OF DATA PROVIDED IN THE DEIS AND THE OUTDATED NATURE OF THAT DATA.

Based on data and analysis previously provided by DOT, the traffic volume either is INCREASING or DECREASING (DOT Web Page).

The DOT appears to have been changing the traffic volume data according to what NCDOT is trying to show at any given point in time. In the 1993 Environmental Assessment, the NCDOT discarded the Travel Forecast Technical Memorandum prepared for the NCDOT by Greiner, Inc. dated July, 1991 in favor of a few days of traffic counts in July, 1993. The DEIS to be acceptable must have more complete data and more careful analysis.

For example, the use of the 1998 Average Daily Traffic (ADT) as the starting point for calculations is misleading and inaccurate because NCDOT documents state that the 1998 ADT is based on 1994 traffic counts. Why use 8 year old data when NCDOT has done many traffic counts to determine a valid ADT and existing trends in traffic volume. It is statistically improper to use 1994 ACTUAL traffic counts and 2025 ADT ESTIMATES to interpolate the 1998 ADT.

The DEIS notes that "traffic is expected to GROW between 73 and 87 percent between 1998 and 2025" (DEIS p. 1-8 Emphasis added). This estimate is "based on local population and employment growth trends". (DEIS p.1-8). However, data retrieved from NCDOT Web Page on August 6, 2002, show that traffic on US 321 has DECREASED as follows:

1998	14525	from North	7525	from South
1999	10000	from North	7600	from South
2000	8700	from North	6800	from South

These data show that in the two year period (1998-2000) traffic southbound DECREASED 40% and northbound a DECREASE of 10%. This makes the expected increase of 73-87 % more speculative conjecture and hardly reliable enough for making a decision.

The new data from the Web Page casts into doubt Table 1-1 and Figure 1-3 of the DEIS and the decisions relying on them.

The statement is made that "design hourly volume" is expressed as a percentage of ADT with no reference to how or why this percentage is obtained or its validity. In addition, the ADT in 2025 is based on partly 1998 ADT data and any calculations based therein are suspect.

Section 1.5.6

LEVEL OF SERVICE BEING A QUALITATIVE RATHER THAN QUANTITATIVE FACTOR DEPENDS ON THE OBSERVER AND MY OBSERVATIONS, BASED ON DAILY USE OF US 321 DIFFER FROM THOSE PRESENTED IN THE DEIS.

The DEIS notes LOS F south of Blowing Rock which is NOT supported by my experience of several roundtrips each week to Hickory. Even Level E occurs very infrequently, less than 1 percent of the time--a few weekend days each year. Normally Level D exists on this short stretch of US 321 with little delay (1-2 minutes) over the posted speed time. In over 100 roundtrips to Hickory I was only delayed more than a few minutes over the speedlimit time of 16 minutes to Patterson on a few occasions. On each of these occasions the delay was caused by NCDOT paving a small segment of the shoulder (a 20 minute delay each way). In addition, I remember a blasting incident near Kirby Mountain Road that closed US 321 from Friday morning until the following Monday noon.

The DEIS notes that LOS D/E exists in all locations within Blowing Rock south of the intersection of US 221. Again, this subjective determination does not match my daily observations. LOS D/E is observed only on rare occasions during the Fall "leaf season" especially when there is an ASU football game scheduled. As noted in the DEIS, "for urban areas, LOS D is typically acceptable when it is too costly or environmentally damaging to design for a better level of service". (DEIS p.1-11). There is no valid reason to design to LOS C and destroy the Town of Blowing Rock to cut a minute or 2 off through traffic travel time when a true bypass can reduce travel time by 5 minutes 28 seconds. See comments Section 1.0.

A careful observation of traffic flow (from a location at the corner of US 321 and Shoppes on the Parkway) led me to believe that most of the delay was caused by the traffic signal timing problems with the US 221 and Possum Hollow Road signals and the failure to have left turn lanes at the Possum Hollow intersection. Frequently a cycle of light changes would allow only a few cars through causing backed up traffic along US 321 in both directions. Proper coordination of the signals--or police directed traffic --could eliminate--or at least mitigate--excessive delays even on the occasion of Fall leaf/football weekends.

The total emphasis in Section 1.5.6 seems to be on the through-travel traffic which is better routed to a true bypass which is the ONLY way to meet the requirements of the HTFA. The total lack of consideration for local traffic is contained in the statement " a poor level of service rating still can be considered acceptable for an unsignalized intersection---because the unsignalized intersection analysis is based upon the delay for minor street drivers as they await sufficient gaps in major street traffic." (DEIS p.1-10).

How long are they required to wait before it is too long? 5 minutes? 10 minutes? one hour?

In my opinion, the accidents at Pinnacle Avenue/Country Club Drive are examples of drivers on the "minor" street (Canyon's parking lot and Blowing Rock Country Club entrance) misjudging the speed of US 321 traffic (usually above the posted speed of 35 mph) and trying to enter US 321 without a sufficient gap.

There is NO way in which the projected traffic volume can meet LOS C or better in 2025 in Blowing Rock in a safe manner, NCDOT knows, or reasonably should know it. A true bypass is the only way to satisfy the HFTA and the cost difference amortized over a 50 year life of the road is minimal and the savings in terms of reduced accidents, travel time and operating cost for truckers is impressive.

DO THE RIGHT THING BUILD A TRUE BYPASS NOW.

Section 1.5.7

ACCIDENT DATA ARE MISLEADING. INCOMPLETE, AND SKEWED TO SUPPORT THE WIDENING ALTERNATIVE.

Limiting the accident /safety analysis to the period 1996-1999 is unnecessarily restrictive. Data are available to examine a longer period, 10 years or more, to better understand the problem. The selection period just happens to include the only fatality in more than a decade along US 321 in Blowing Rock.

A detailed analysis of hundreds of individual accident reports show a different scenario: (1) most property damage accidents in Blowing Rock are not on US 321 but in the parking lots of Shoppes on the Parkway or the Post Office; (2) most of the "non-fatal" injury accidents involve injuries so slight that no treatment is required; and (3) most accidents involve inattention (48% rear ending slowing or stopped cars) and the uncontrolled access at popular restaurants and businesses (24% angle accidents).

The widening of US 321 will INCREASE the traffic speed and the minor property damage/minor injury accidents may escalate into severe property damage /severe injury or fatal accidents. The inattention and uncontrolled access will not be improved by widening, only the speed will increase. At present, there is a speed control device present that frequently holds speed of traffic to the posted limit--a single lane with no passing. For example, when I am traveling on US 321 at the posted speed, vehicles exceeding the posted limit will stack up behind me until I turn off--with 2 lanes in each direction passing is easy and the posted limit becomes a joke.

The proposed widening alternative will do little or nothing to improve safety at the five high accident locations in Blowing Rock.

Green Hill Road--higher speeds may increase the number and severity of accidents without a signal and left turn lane.

Pinnacle Avenue/Country Club Drive--the refusal of DOT to put a left turn lane at this location and unrestricted access to Canyon's parking lot coupled with higher speeds will probably result in more severe accidents at this location.

US 321 Business-- redesign of the intersection and the installation of a traffic signal may improve this intersection but inattention and high speed may result in accidents at this location. However a traffic signal is not included in the initial plan.

Section 1.5.7
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Sunset Drive--no change in the intersection and probably will remain a high accident location with severity of property damage increasing with speed.

Possum Hollow Road/Shoppes-- is a signalized intersection on a 4 lane highway and no changes will be made. The REFUSAL of DOT to put in a left turn lane will probably keep this intersection on the high accident list.

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Re: US 321 Improvements Project
Federal Aid No. NHF-321 (1)
State Project No. 6.7939001T/
TIP No. R-2237C
Caldwell and Watauga Counties, NC

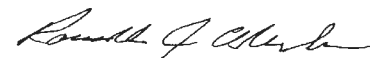
Dear Mr. Gilmore, P.E.:

Thank you for permitting me to comment concerning the areas in the Draft Environmental Impact Statement (DEIS) and Draft Section 4(f) Evaluation dated June 3, 2002, for the subject project. In order to facilitate your review and to expedite your response to these comments, I will provide a separate letter for each section for which I wish to comment. This letter comments on Sections 2.1.1, 2.1.2, 2.1.3, 2.2.2, 2.3.5, 2.4.1, 2.4.2, and 2.4.3.

These comments are included as separate attachments.

Very truly yours,

Ronald J. Oberle



Attachments